

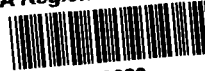


State of Ohio Environmental Protection Agency

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George V. Voinovich  
Governor

March 9, 1998

**RE: Holmden Avenue -  
Final Report for Removal Activities**

Mr. Ababi Harris  
U.S. EPA Region 5  
77 W. Jackson Blvd. SR-6J  
Chicago, IL 60604-3590

Dear Mr. Harris:

The Final Report for Removal Activities at the Holmden Avenue property in Cleveland, Ohio was received by this office on February 6, 1998. Ohio EPA has the following comments on the report:

**Section 1.3 Removal Action Objectives** *Comment # 1* (page 1): Since the Holmden Avenue Order specifically calls for the determination of a lead clean-up number for the property through the use of a U.S. EPA-approved model, please reference any agreements reached with the Agencies in this section, or provide additional rationale for the choice of the 400 ppm level as the clean-up objective. Although the Agency is aware that the 400 mg/kg used as the "residential clean-up level" at the Holmden Avenue property could be based on the July 14, 1994 OSWER Directive No. 9355.4-12 (EPA/540/F-94/043; PB 94-963282) that set a screening level of 400 ppm for residential land use, given the technical difference between a screening level and clean up levels, please provide the rationale requested.

**Section 4.4 Material Storage pending End Use Determination** *Comment # 2* (page 8): In order to comply with the terms and conditions of the Holmden Avenue Order (Section 2.8), please provide information on the ultimate (appropriate) disposition of the material stockpiled on-site. The information can be provided as a separate addendum to the Report as soon as it is available.

**General** *Comment # 3*: Please include information in this Final Report on (estimates of) the total costs incurred in complying with the Holmden Avenue Order, as required by the Section 2.8 of the Order.

Please let me know if I can clarify any of my comments.

Sincerely,

Sheila Abraham  
Environmental Specialist  
Division of Emergency Remedial Response

SA:cl

cc: Bob Princic, Ohio EPA, DERR-NEDO